



33228 West 12 Mile Road, Suite 375
Farmington Hills, MI 48334
(248)-987-8929
keithaltman@kaltmanlaw.com

March 23, 2023

VIA ECF

Honorable Margo K. Brodie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Smigiel v. College of Staten Island*, Case No. 21-cv-06323 (MKB)(RML)
Request for Pre-Motion Conference**

Dear Judge Brodie,

This firm represents the Plaintiff in the above-referenced matter (the “Action”). We write pursuant to the Court’s Individual Rules and seek a pre-motion conference concerning Plaintiff’s proposed Motion for Leave to Amend.

I. Background

Plaintiff Daniel Smigiel (“Smigiel”) filed the present Action on November 15, 2021. This honorable court dismissed Plaintiff’s claims without prejudice on February 21, 2023.

II. Plaintiff’s Proposed Motion for Leave to Amend

Plaintiff requests a Pre-Motion Conference in regard to Plaintiff’s proposed Motion for Leave to Amend. The Motion for Leave, along with the attached Amended Complaint, for which Plaintiff seeks leave to file, is attached hereto as *Exhibit 1*. Plaintiff requests that this honorable court grant leave to amend under Fed. R. Civ. P. 15.

We thank the Court for its consideration of the above.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Keith Altman".

Keith Altman, Esq.
Attorney for Plaintiff